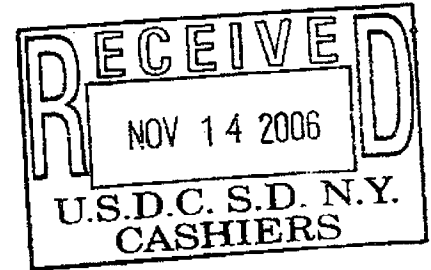


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Attorneys for Respondent



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JUDGE LYNCH

----- x
In the Matter of the Arbitration Between

STORM LLC,

Petitioner,

-against-

TELENOR MOBILE COMMUNICATIONS AS,

Respondent.
----- x

06 CV 13157

NOTICE OF REMOVAL

Respondent Telenor Mobile Communications AS ("Telenor Mobile") removes the above-entitled action to this Court from the Supreme Court of the State of New York, County of New York, and in support thereof, states as follows:

1. As set forth in the petition and the exhibits to the petition herein (the "Petition"), petitioner Storm LLC ("Storm") was at the time this action was commenced, and at all times relevant herein has been, a limited liability company duly organized and existing under the laws of Ukraine. As further set forth in the Petition and the exhibits thereto, Storm's principal place of business is in Ukraine.

2. Telenor Mobile was at the time this action was commenced, and at all times relevant hereto has been, a corporation duly organized and existing under the laws of Norway, with its principal place of business in Norway.

3. The Petition seeks an order and judgment (a) vacating a partial arbitration award denying Storm's motion to dismiss an ongoing arbitration pending within the Southern District of New York and (b) preliminarily and permanently enjoining that arbitration. The arbitration at issue is being conducted pursuant to the arbitration clause of a shareholders agreement between and among Storm, Telenor Mobile and Closed Joint Stock Company "Kyivstar G.S.M." ("Kyivstar"), a Ukrainian corporation (the "Shareholders Agreement") whose operations are in Ukraine. Storm and Telenor are the sole shareholders of Kyivstar. A true copy of the Shareholders Agreement is annexed hereto as Exhibit A, and is made a part hereof as if fully set forth herein.

4. Article XII of the Shareholders Agreement contains an arbitration agreement falling under the Convention on the Recognition and Enforcement of Foreign Arbitral Awards of June 10, 1958 (the "New York Convention") and Chapter 2 of the Federal Arbitration Act, 9 U.S.C. §§ 201-208 ("Chapter 2"). The award Petitioner seeks to vacate, and the arbitration Petitioner seeks to enjoin, likewise fall under the New York Convention and Chapter 2.

5. By reason of the foregoing, this Court has original jurisdiction over the subject matter of this action pursuant to 9 U.S.C. § 203 and 28 U.S.C. § 1331, and the action may be, and hereby is, removed to this Court pursuant to 9 U.S.C. § 205 and 28 U.S.C. § 1441.

6. The Petition is the initial pleading setting forth the claims for relief on which this action is based. On November 13, 2006 a copy of petitioner's Order to Show Cause, the Petition, and the supporting papers thereon was delivered to Telenor Mobile's undersigned attorneys, which was the first notice or service of this action or the Petition or any of such papers

on Telenor Mobile. This notice is filed within the time provided by law.

7. Annexed hereto as Exhibit B is a true copy of the Order to Show Cause, the Petition and all supporting papers thereon, together with all exhibits thereto. Exhibit B constitutes a copy of all process, pleadings and orders heretofore served upon or delivered to Telenor Mobile.

Dated: New York, New York
November 14, 2006

ORRICK, HERRINGTON & SUTCLIFFE LLP

By 
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